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November 14, 2022

VIA ECF

Honorable Colleen McMahon
United States District Judge -SDNY
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

Re: *United States v. Luis Casado-Calderon*
Ind. # 21 Cr. 748 (CM)

11/15/2022
Modification
allowed.
to order
Clea
JSD

Dear Judge McMahon:

I represent Mr. Casado-Calderon who entered a guilty plea before Your Honor on September 29, 2022. He is scheduled for sentencing on January 10, 2023.

Mr. Casado-Calderon is subject to home detention since his arrest on November 12, 2021. Today, I received an email from Pre Trial-Services officer, Ashley Cosme, who stated that "Mr. Casado has remained in compliance with all conditions since his release. Based on his sustained compliance for over a year, I would recommend that the condition of home detention be decreased to a curfew enforced by location monitoring." Officer Cosme further stated that if permitted, "we would ask that curfew hours be at the discretion of Pretrial Services."

It is therefore respectfully requested that Your Honor modify Mr. Casado-Calderon's bail conditions from home detention to a monitored curfew. Notably, one of the reasons for this modification is Mr. Casado-Calderon's frequent needs to attend medical appointments.

I have spoken the government about his request, and they take no position.

Thank you for your attention and consideration.

Very Truly Yours,

SULLIVAN|BRILL, LLP

By: Steven Brill

